

**UNITED STATES DISTRICT COURT**  
 for the  
 Western District of Pennsylvania

United States of America	)	
v.	)	
	)	Case No.
	)	25-MJ-455
	)	
LUIS ALFONSO BISONO RODRIGUEZ	)	<b>[UNDER SEAL]</b>
	)	

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2024 through January 2025 in the county of Allegheny in the  
Western District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, USC § 2314	Transportation of Stolen Money
Title 18, USC § 2315	Receipt of Stolen Money
Title 18, USC § 2	Aiding and Abetting

This criminal complaint is based on these facts:

Please see attached Affidavit in Support of Criminal Complaint.

Continued on the attached sheet.

*/s/ Travis Reece*

*Complainant's signature*

*Special Agent Travis Reece, FBI*

*Printed name and title*

Sworn to before me and signed in my presence.



*Judge's signature*

Date: 03/19/2025

City and state: Pittsburgh, Pennsylvania

*Honorable Maureen P. Kelly, U.S. Magistrate Judge*

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
 )  
 v. ) Magistrate No. 25-455  
 ) [UNDER SEAL]  
 LUIS ALFONSO BISONO RODRIGUEZ )

AFFIDAVIT BY TELEPHONIC OR OTHER RELIABLE ELECTRONIC MEANS  
IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Travis Reece, of the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This Affidavit is made for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant that from in or around June 2024, and continuing through January 2025, in the Western District of Pennsylvania and elsewhere, LUIS ALFONSO BISONO RODRIGUEZ (“BISONO-RODRIGUEZ”) violated Title 18, United States Code, Sections 2314 (Transportation of Stolen Money), 2315 (Receipt of Stolen Money) and 2 (Aiding and Abetting) (hereinafter, the “Subject Offenses”). Section 2314 makes it a federal criminal offense to either: (1) transport in interstate commerce \$5,000 or more of money, knowing that the money was taken by fraud; or (2) induce another to travel in interstate commerce in the execution a scheme to defraud \$5,000 or more. Section 2315 makes it a federal criminal offense to receive \$5,000 or more of money which crosses a state line after having been stolen, knowing that the money was stolen. Section 2 makes it a federal offense at aid, abet or induce a federal offense, and it also makes it a federal offense to willfully cause an act to be done which if done by the principal, would be an offense against the United States.

2. I am an “Investigative or Law Enforcement Officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

3. I entered on duty as a Special Agent of the FBI in March 2024. I have received training and gained experience in interviewing and interrogation techniques, the execution of federal search and seizure warrants, and the identification and collection of financial and computer-related evidence. I am currently assigned to the Complex Financial Crimes and Health Care Fraud squad in the FBI’s Pittsburgh Field Office.

4. The information contained in this affidavit is based upon my personal knowledge; knowledge obtained during my participation in this investigation; knowledge obtained from other individuals, including my conversations with other law enforcement officers; knowledge obtained from my review of documents, computer records, and other evidence related to this investigation; and knowledge gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

#### PROBABLE CAUSE

5. The FBI has probable cause to believe that BISONO-RODRIGUEZ is a member of an organized crime group that operates across Pennsylvania and Ohio to defraud victims in the Western District of Pennsylvania out of tens of thousands of dollars pursuant to a grandparent scam. As further detailed below, Investigations into each of the incidents revealed that the stolen funds were unknowingly transported across the state line by Uber or Lyft drivers and, on several

occasions, delivered to Northern District of Ohio resident BISONO-RODRIGUEZ.

6. In this type of fraud, the scammers call and impersonate a grandchild – or another close relative – in a crisis situation, asking for immediate financial assistance. Often the imposter claims to have been in an accident or arrested and may hand the phone over to someone posing as a lawyer seeking immediate payment.

7. In January 2025, five police departments located in the Western District of Pennsylvania requested assistance from the FBI. Each department was investigating an incident that had occurred within the previous 120 days where an elderly victim had been defrauded by a scammer who stole funds from the victim through the pretense that a family member had been arrested, or was in an accident, and needed money.

8. The events that establish probable cause for the criminal complaint and arrest warrant are summarized below.

**Millcreek Township Police Department Investigation**

9. On October 22, 2024, victim C.S., who is 74 years old, reported to the Millcreek Township Police Department (“MTPD”) that she was the victim of a grandparent scam. As a result of the scam, C.S. lost \$9,500.

10. On October 18, 2024, C.S. received a phone call from a male who identified himself as C.S.’s grandson, Gabriel. Gabriel advised that he was in a car accident with another vehicle and that the pregnant driver of the other vehicle had suffered injuries. Gabriel stated that an attorney would soon contact C.S. about the matter.

11. Shortly thereafter, a male called C.S. under the guise that he was Matthew Arnold, a public defender. Arnold advised C.S. that her grandson was going to be charged with reckless endangerment and that his bond was set at \$9,500. Arnold told C.S. that her money would be returned in approximately a week, as the funds would be held as collateral. Arnold then instructed

C.S. to proceed to her bank to withdraw \$9,500 in cash and that Arnold's assistant, Christian Ashford, would call C.S. back with additional details about what to do with the funds. Arnold also advised C.S. not to tell anyone at the bank what the money was for. When C.S. arrived at a PNC Bank branch, C.S. told the teller that the funds were a gift for her grandson.

12. After she withdrew the funds, C.S. spoke with Ashford, who advised C.S. to place the \$9,500 into an envelope and write the words "legal documents" on the envelope. Ashford told C.S. that a driver named Glen would pick-up the funds and that Glen would be driving a gray Buick SUV. The driver arrived at C.S.'s residence shortly thereafter in the vehicle described by Ashford. C.S. noticed a neon sign in the window consistent with those used by drivers for Uber and Lyft. Around 1:30 in the afternoon, Ashford called C.S. and confirmed that the funds had been picked up and provided C.S. with a delivery confirmation number.

13. Shortly thereafter, Ashford called C.S. and stated that the pregnant woman involved in the accident had lost her child and that an additional \$9,500 in fees would be required. C.S. refused to pay the extra amount and received no more contact from Ashford or Arnold.

14. On October 21, 2024, C.S. contacted her grandson to check on his welfare. Upon speaking to her grandson, C.S. realized that she had been the victim of a scam.

15. To generate leads in the investigation, MTPD posted information about the case to Facebook via tip411, a web-based tool that provides law enforcement agencies a way to receive anonymous tips and publish public safety alerts to their communities.

16. On October 25, 2024, MTPD received a phone call from G.C. in reference to the Tip411 post on Facebook. G.C. stated that he was Glen, the Lyft<sup>1</sup> driver of the gray Buick SUV

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<sup>1</sup> The FBI interviewed G.C., who confirmed that he drives for both Uber and Lyft and was driving for Lyft when the instant ride took place.

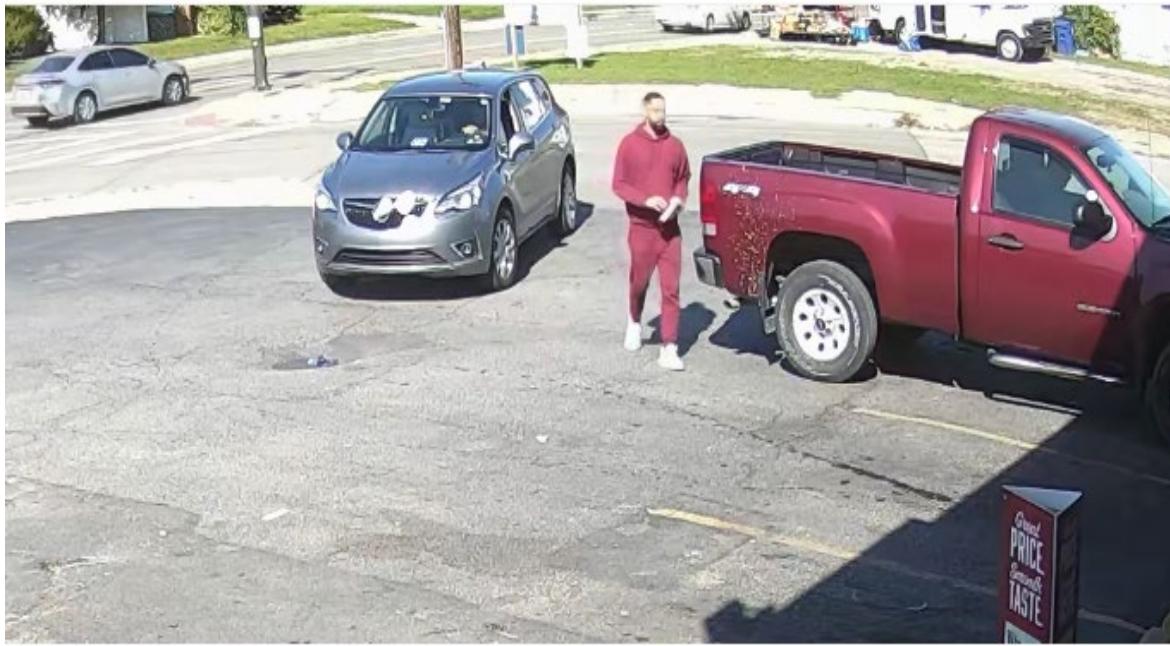
who picked up the package from C.S. G.C. stated that he drove the package to a gas station in Cleveland, Ohio, and provided the package to a black male, who then departed on foot.

17. G.C. used his Lyft app to identify the drop off point for the package as Fulton Beverage, 3335 Fulton Road, Cleveland, OH 44109. MTPD subsequently obtained surveillance footage from the owner of Fulton Beverage that showed the pick-up and drop off of the funds. In February 2025, the FBI obtained and reviewed a copy of the surveillance footage from MTPD.

18. The footage showed that G.C. arrived in the parking lot in his gray Buick SUV. A male wearing a maroon hoodie, sweatpants and white sneakers, immediately approached G.C.'s vehicle. G.C. handed the male the package. The male placed the package into the front pocket of his hoodie and then entered the store. The male purchased a beverage and exited the store. A side camera on the exterior of the business captured the suspect coming from, and returning to, a white small panel van which was parked on a side street adjacent to the business. The suspect then departed from the area.

19. Below are screenshots from the footage of the subject who picked up the funds from G.C.'s vehicle:





20. Through additional investigation, a Facebook account was identified in the name of Luis Alfonso Bisono RODRIGUEZ. The account is public and, as of February 11, 2025, contained the images below:



21. In February 2025, in response to legal process, Facebook provided subscriber information for the Facebook account discussed above. The subscriber was listed as Luis Alfonso Bisono-Rodriguez with an associated email address luis.bisono2@gmail.com.

22. As explained in more detail below, in February 2025, in response to legal process, the FBI obtained records for several of BISONO-RODRIGUEZ's accounts with Key Bank. One of the accounts, ending in 0336, reflected two debits that posted on October 21, 2024 from Fulton Beverage.

23. In March 2025, in response to legal process, the FBI obtained records from Western Union for transactions conducted by BISONO-RODRIGUEZ. The information provided by Western Union showed that on October 19, 2024, one day after he picked-up the funds from C.S., BISONO-RODRIGUEZ went to a Walmart in Cleveland and sent \$2,000 via international wire to an individual in Santiago, Dominican Republic.

#### Grove City Police Department Investigation

24. On November 20, 2024, victims P.R. and M.R., a married couple in their mid-seventies, reported to the Grove City Police Department ("GCPD") that they were the victim of a grandparent scam that resulted in a loss of \$9,000.

25. At approximately 10:00 on November 20, 2024, P.R. and M.R. received a telephone call on their home landline. The male on the phone said that they were the couples' son, David. David explained that he had been in a car accident and that the police had just arrested him. David said that he would then transfer the call to his attorney, a public defender in New Hampshire named Mark Cohen. P.R. and M.R.'s son David lives in Vermont, so they believed the call to be plausible.

26. Cohen stated that David needed bond money, and that Cohen would put the couple in touch with Michael Roberts, a bail bondsman. Roberts then called the victims and said that David had a \$20,000 bond, which could be reduced to \$9,000. Roberts instructed P.R. and M.R.

to obtain \$9,000 in cash and place it in a sealed manila envelope with additional packaging. Roberts then instructed the victims to go to UPMC Jamestown, a hospital in New Castle, Pennsylvania, where a courier would pick-up the funds.

27. The victims proceeded to obtain the funds from their account at Citizens Bank and drove to New Castle, arriving at the hospital at approximately 1:15 p.m. Outside of the hospital, the victims met a male, who picked up the funds. The victims noted that the driver's vehicle had Pennsylvania tag LZH6356.

28. Approximately two hours later, the victims received a call from Cohen saying that the other driver in the accident was pregnant and had miscarried, so now David had to pay the full \$20,000 bond. At this point, P.R. and M.R. began to suspect that they may be the victims of a scam and contacted their actual son David, who confirmed that he had neither been arrested nor in an accident.

29. GCPD located R.L.J., the driver of the vehicle with Pennsylvania tag LZH6356. After being advised of his Miranda rights, R.L.J. voluntarily agreed to talk to GCPD officers. R.L.J. stated that he drives for Uber to supplement his income. R.L.J. recalled recently picking up a package from an older male and dropping the package off at a Sheetz in Cleveland, Ohio. R.L.J. stated that he was met at the Sheetz by a white male who confirmed that R.L.J. was the driver of the Uber and proceeded to take the package out of the back seat.

30. Through his Uber App, R.L.J confirmed that the drop off location for the package was the Sheetz located at 6200 Brookpark Road, Cleveland, OH 44129.

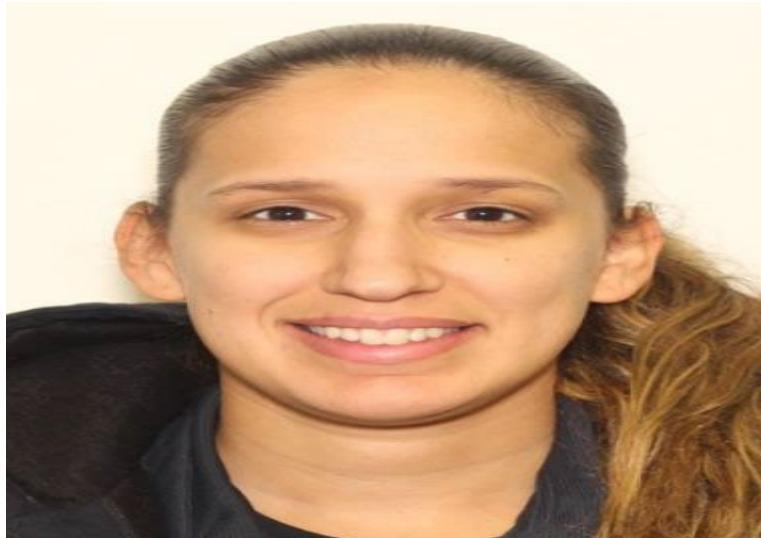
31. GCPD subsequently obtained surveillance footage from Sheetz that showed the pick-up and drop off of the funds. The FBI also obtained a copy of this footage from Sheetz in February 2025.

32. The video depicted a male holding a large envelope that is consistent with the envelope that contained the victims' funds. The video also showed the subject in possession of, and regularly checking a cellular telephone. A photograph of the subject from the Sheetz surveillance footage is below:

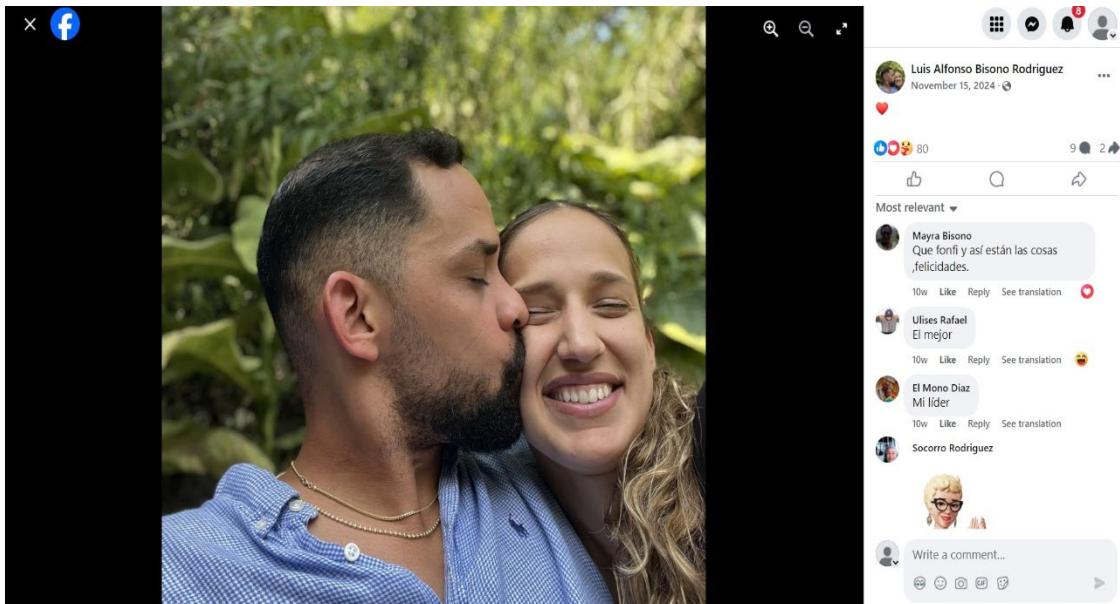


33. The subject was then observed entering and departing the Sheetz in a green Toyota with Ohio tag KMH6087, which is registered to Zuleika CAMACHO with an associated address of 3311 33rd Street, Cleveland, OH 44109.

34. CAMACHO's Ohio Driver's License photo is pictured below:



35. CAMACHO appears to be the same woman depicted in numerous photos on RODRIGUEZ'S Facebook page, including the photograph below:



### **Scott Township Police Department Investigation**

36. On December 10, 2024, victim S.M., who is 90 years old, contacted the Scott Township Police Department. (“STPD”) and reported that she had been defrauded out of \$20,000. Earlier that day, S.M. received a phone call from a male who posed as attorney “Frank Martin.” Martin informed S.M. that S.M.’s son had been in an accident and needed \$20,000 for bail and

attorney's fees. Later that day, a white Toyota Highlander came to pick-up the funds, which were packaged in envelopes and placed in a shoebox, per the scammer's instructions.

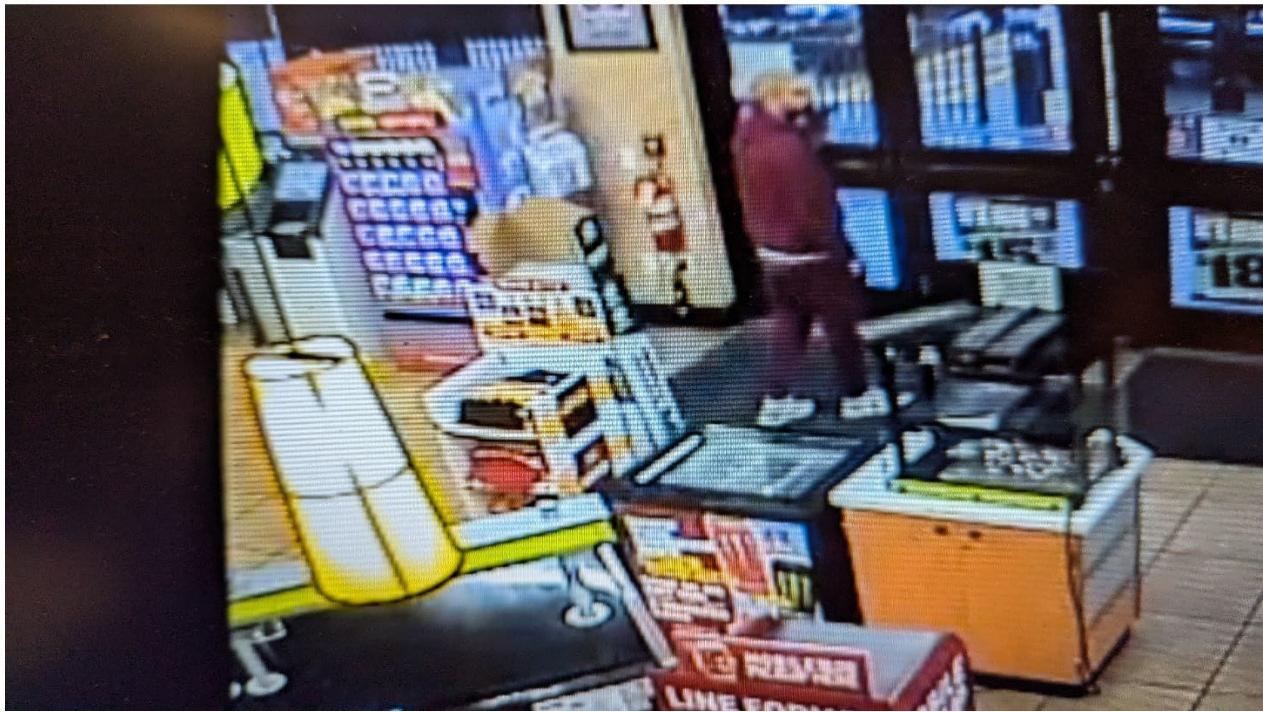
37. STPD identified the driver of the Toyota Highlander as J.C., a local Uber driver. After being advised of his Miranda rights, J.C. agreed to cooperate with the investigation and told STPD that J.C. believed that he was picking up documents from the victim and delivered the package to a Sheetz near Cleveland, Ohio. When J.C. arrived at the Sheetz, J.C. was met by a Spanish speaking male who picked up the package.

38. J.C. voluntarily provided STPD with information about the trip from J.C.'s Uber App. The information showed that the drop off was made at the Sheetz located at 6767 Ridge Road, Parma, OH 44127.

39. Information provided to the FBI by Uber confirmed that the drop off occurred around 3:28 PM and originated in the immediate vicinity of S.M.'s residence.

40. On December 24, 2024, an officer from STPD contacted Sheetz about the incident and spoke to a fraud investigator at Sheetz. The fraud investigator informed STPD that Sheetz had also been contacted about a similar incident out of Grove City. The footage of this incident was provided by Sheetz to both STPD and the FBI.

41. The subject, who is wearing a maroon hoodie, sweatpants and white sneakers, can be seen for several minutes walking inside and outside of the Sheetz and frequently checking a cellular telephone in his possession. The outfit worn by the subject appears to be virtually identical to the subject in the Millcreek Township case. A screenshot of the subject is below:



42. Eventually, a white SUV arrived at the Sheetz, and the subject picked up a package from the driver of the vehicle. The subject then walked to what appeared to be a green Toyota and exited the Sheetz. The vehicle is consistent with the vehicle used to do the pick-up in the Grove City investigation that was registered to CAMACHO.

43. Records obtained by the FBI from Western Union show that on December 10, 2024, at approximately 6:00 PM, a few hours after the incident described above, BISONO RODRIGUEZ went to a Walmart in Cleveland and sent \$2,400 via international wire to an individual in Santiago, Dominican Republic.

44. In March 2025, the FBI received additional information from Uber about the account that ordered this ride. The information provided by Uber showed that the account was registered in the name Jesus Cardona and had ordered approximately 80 other rides in the period between December 2024 and March 2025. Multiple other victims have been identified from the Cardona account, including an elderly victim in Connecticut who was defrauded out \$14,000 on

March 11, 2025, and an elderly victim in Kentucky where there was an attempt to defraud the victim out of roughly \$9,000 on March 11, 2025.

45. Uber provided the GPS coordinates where the user of the Cardona account was located when the aforementioned rides were ordered on March 11, 2025. The coordinates geolocated to Santiago, Dominican Republic. I am aware that the FBI have investigated other grandparent scam organizations with a connection to the Dominican Republic.

46. Information provided to the FBI by the Department of Homeland Security showed that BISONO-RODRIGUEZ is a citizen of the Dominican Republic. He was admitted as a non-immigrant B-2 (Temporary Visitor for Pleasure /Tourism), with authorization to remain in the United States until March 4, 2022. It appears that BISONO RODRIGUEZ has remained past this date without authorization.

#### **Fox Chapel Police Department Investigation**

47. On December 12<sup>th</sup>, 2024, victim C.M., who is 89 years old and hearing impaired, reported to the Fox Chapel Police Department (“FCPD”) that were they victim of a scam. As a result of the scam, C.M. lost \$6,000, with an additional attempted theft of \$19,000.

48. C.M. stated that on December 12, 2024, he received a phone call from a male who C.M. believed was his son. The individual posing as C.M.’s son explained that he was arrested in Maryland and needed bond money to get out of jail. The individual further explained that a public defender was representing him and would call C.M. to explain the details of the bond.

49. Shortly thereafter, the alleged public defender called C.M. and identified himself as Matthew Arnold, the same name used by the scammer in the fraud perpetrated against victim C.S. from Millcreek Township. Arnold explained that C.M.’s son was operating his vehicle in Baltimore, Maryland and was involved in an accident while he was intoxicated. Arnold further said that a pregnant female was inside the vehicle that was hit, had sustained injuries, and C.M.’s

son was being held in jail. Arnold explained that CM's bond was set at \$6,000, which had to be paid to a bondsman in cash. C.M. told the male that he wanted to assist his son and stated that he would comply with the request. C.M. was instructed to call the subject back when C.M. secured the required funds.

50. C.M. drove to a local PNC Bank branch and withdrew \$6,000. When C.M. returned home, he called Arnold and told him the funds were secured. C.M. was instructed by Arnold to place the cash inside an envelope with his name on it and the case number (WE6657896) and to put the envelope inside a sealed box with the words "legal documents" on the outside of the box. Arnold placed C.M. on hold for approximately 30 minutes and said that he was contacting a local courier for the bondsman. After approximately 30 minutes, C.M. was told that a courier was found and that the courier would arrive at C.M.'s home in a black Toyota Rav4.

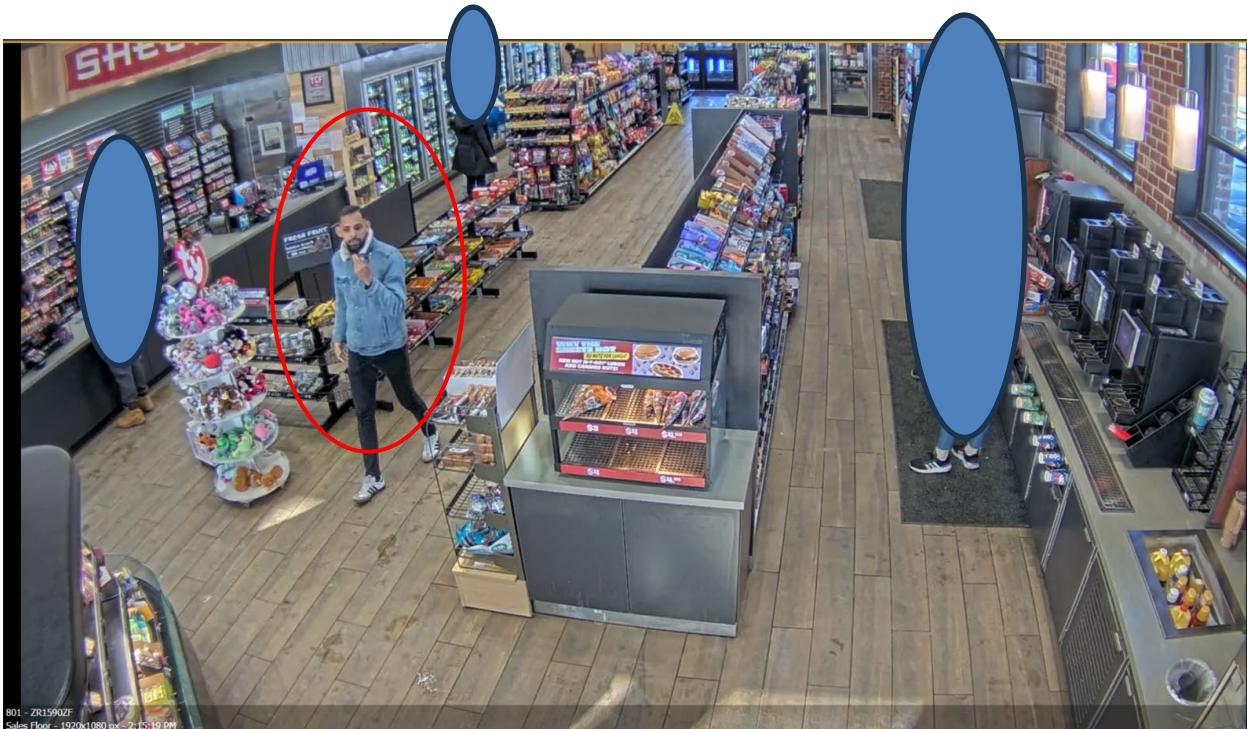
51. At approximately 12:08 PM, the Toyota Rav4 that Arnold described arrived at C.M.'s home and was driven by a middle-aged white female. C.M. gave the driver the sealed box. The driver told C.M. that she had arrived to pick up a person and C.M. handed the driver his phone so that she could talk to Arnold. The driver had a short conversation with Arnold and left the residence with funds.

52. At approximately 2:12 PM, an individual matching BISONO-RODRIGUEZ's description exited the vehicle circled below and walks inside the Sheetz located at 6200 Brookpark

Road.



53. The subject is seen for several minutes walking inside the Sheetz while continually interacting with a cellular telephone in his possession.



54. Eventually, a black Toyota arrived at the Sheetz and the subject waved at the vehicle. The black Toyota is consistent with the vehicle that picked up the sealed box from C.M. The vehicle then pulls up to the subject. The subject is then seen walking away with a small brown box and a cellular telephone in his right hand.



55. The subject was then observed departing the Sheetz in a black Nissan Rogue with Ohio tag KGY6009, which is registered to Zuleika CAMACHO with an associated address of 3311 33rd Street, Cleveland, OH 44109. Therefore, probable cause exists that BISONO-RODRIGUEZ received the \$6,000 stolen from C.M.

56. Records obtained by the FBI from Western Union show that on December 12, 2024, at approximately 3:16PM, roughly an hour after the incident described above, BISONO RODRIGUEZ went to a Walmart in Cleveland and sent \$3,500 via international wire to an individual in Santiago, Dominican Republic.

57. In addition to the completed fraud described above, C.M. received another call on December 12, 2024 informing him that manslaughter charges were now filed against C.M.'s son. Thus, C.M.'s son would need an additional \$19,000 bond to be released from jail. At this point, C.M.'s wife decided to call their son. C.M.'s son answered the call and stated that he had not been arrested and was in the State of Tennessee.

58. C.M. notified FCPD of the incident and FCPD decided to interdict the courier during the next scheduled pick-up of funds from C.M. FCPD instructed C.M. to return Arnold's call. A male answered the call and C.M. explained that he had secured the additional \$19,000. Arnold told C.M. that he was going to place him on hold while he filed the bond application. Approximately 45 minutes later, Arnold stated that the application was completed, and he was able to locate another courier.

59. At about 4:00 pm later the same day, C.M was told by Arnold to package the \$19,000 in a similar manner to the \$6,000, and that a courier, operating a gray Nissan SUV, would arrive at his home within five minutes to pick-up the funds. Approximately five minutes later, an FCPD officer viewed a gray Nissan pull into C.M.'s driveway and the driver, J.D., was detained and read his Miranda rights.

60. After being advised of his Miranda rights, J.D. voluntarily agreed to talk to FCPD officers. J.D. stated that he was unaware of any criminal activity and arrived at C.M.'s home to pick-up a person and drive them to Cleveland, Ohio. J.D. stated that he was a Lyft driver and prior to his contact with the police he agreed to the instant fare through the Lift App. J.D. showed FCPD officers the Lift App on his phone and an officer observed that J.D. received an update via text messenger that the booking party told J.D. that he was not transporting a person, but "legal documents." The only identifier in the messenger was the name "Luis." J.D. was instructed to drop off the funds at 3335 Fulton Road, Cleveland, OH 44109, the same location at Fulton Beverage used to pick-up funds from C.S., the victim in Millcreek Township.

#### **Hermitage Police Department Investigation**

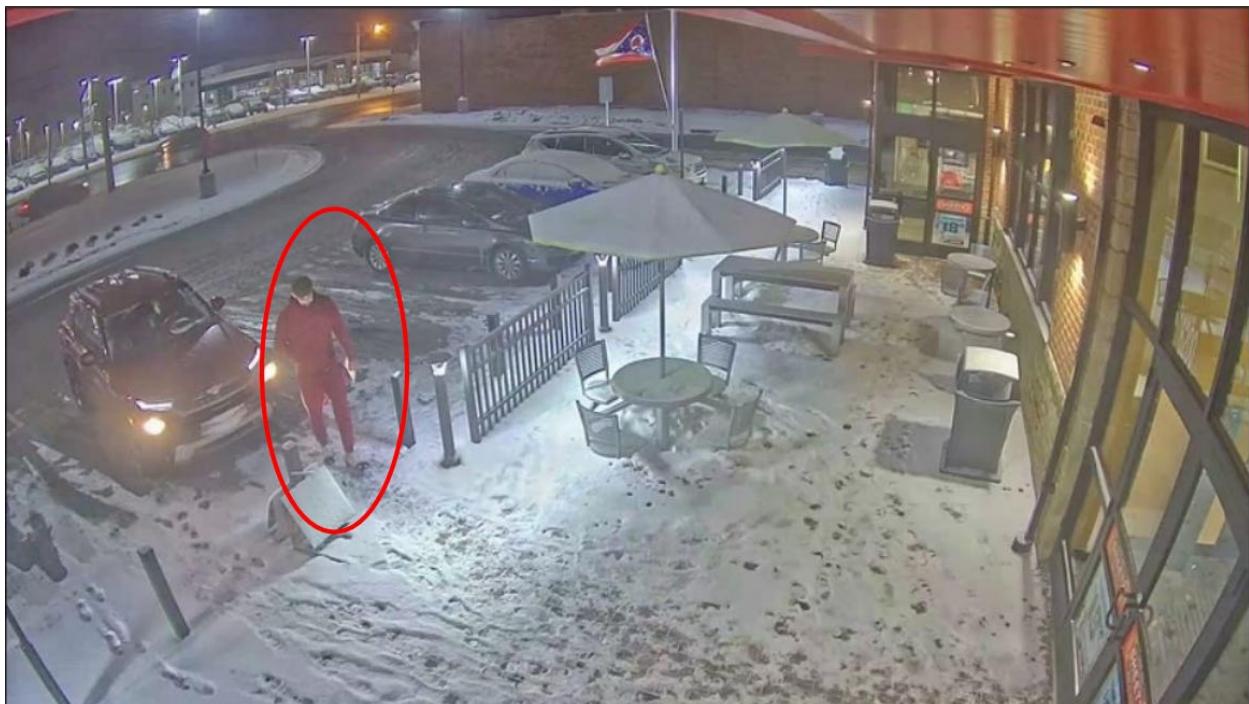
61. On January 14, 2025, victim J.H., who is 91 years old, reported to the Hermitage Police Department ("HPD") that she had been the victim of a scam earlier that day. J.H. explained that she had received a phone call from a man named Matthew Arnold, who claimed to be an attorney representing her grandson. Arnold informed her that her grandson had been arrested for DUI and required a \$10,000 bond for his release, although Arnold subsequently lowered the amount to \$6,500.

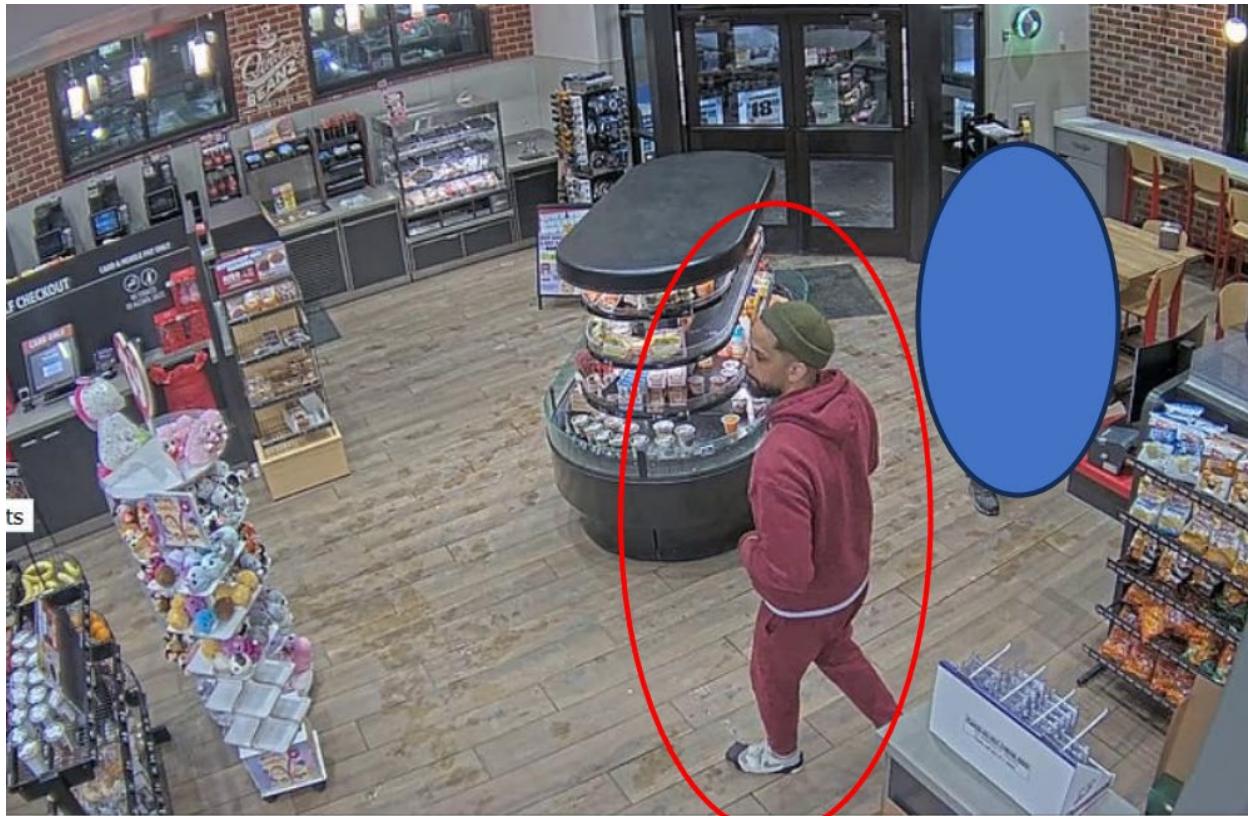
62. J.H. then went to a PNC bank branch and withdrew \$6,500 in \$100 bills. Arnold instructed her to place the cash in a manila envelope, label it as a legal document, and leave it on her front porch for pick-up. Between 4:30 PM and 4:45 PM, J.H. observed a white elderly male approach her house in a burgundy Chevy Trailblazer. J.H. met the man and requested his name and driver's license. The man identified himself as J.M., who told J.H. that he was a Lyft driver assigned to pick up the envelope. After J.M. left, J.H. called her grandson to check on him. During the conversation, he confirmed that he was fine and explained that she had been scammed.

63. Several days after the fraud, HPD located J.M., the Lyft driver who had picked up

the funds from J.H. J.M. told HPD that a customer named “Liam” booked the ride and initially set up the pickup location as Youngstown, Ohio. However, the customer then called then called and requested to meet J.M. at the Sheetz located at 6200 Brookpark Road, Cleveland, OH 44129, the same Sheetz where BISONO-RODRIGUEZ picked-up funds from victims P.R. and M.R. Information from J.M.’s Lyft App showed that he delivered the envelope at the Sheetz at around 6:17 PM on January 14, 2025. According to J.M., the envelope was delivered to a man in his early 30’s and that J.M. received a \$100 tip for the delivery.

64. On January 21, 2025, HPD received video and still files from Sheetz. The files included surveillance footage that depicted a male in maroon sweatpants, sweatshirt and green ski cap approaching J.M.’s vehicle and retrieving an envelope, as shown below:





65. The clothing worn by the subject is consistent with the clothing worn by BISONO-RODRIGUEZ in the other pickups described above.

66. Additional images showed the subject was driving a 2015 light color, Nissan minivan bearing Ohio tag PNB9629. Information from the State of Ohio showed that this vehicle is registered to Denninson ALMONTE with a registered address of 5800 Laurent Drive, Apartment C520, Parma, Ohio 44129.

67. Records obtained by the FBI from Western Union show that on January 15, 2025, at approximately 11:38 AM, within 24 hours after the incident described above, BISONO-RODRIGUEZ went to a Walmart in Cleveland and sent \$2,500 via international wire to an individual in Santiago, Dominican Republic.

68. HPD entered a request in the National Criminal Information Center that the Nissan minivan be located and impounded because it was utilized in connection with the commission of

a felony. On January 22, 2025, the Parma Police Department observed the vehicle leave the Sheetz on Brookpark Road. The vehicle subsequently made an improper turn and Parma PD initiated a traffic stop on the vehicle. The driver was identified as BISONO-RODRIGUEZ, who provided an officer with a copy of his New York State driver's license. Additionally, during the encounter with police, BISONO-RODRIGUEZ called Zuleika Camacho on the telephone to help BISONO-RODRIGUEZ communicate with the officer.

**Findlay Township Police Department Investigation**

69. Based on the incidents above, the FBI located an investigation out of Findlay Township, Pennsylvania, that is likely related to the same scheme.

70. On June 28, 2024, R.C. reported to the Findlay Township Police Department ("FTPD") that his mother, C.C., who is 91 years old, was the victim of an attempted scam earlier that day.

71. C.C. had received a call stating that her nephew was in jail and needed to pay \$9,000 to be released. R.C. recognized that this was likely a scam and contacted FTPD, who advised R.C. to try to maintain contact with the subject. Eventually, the subject stated that they would accept a payment of \$3,200, and R.C. told the individual that R.C. had obtained the money from the bank.

72. The subject confirmed R.C.'s name and address and advised that a courier would be sent to pick up the funds. The subject told R.C. to place the funds in a padded manila envelope located inside of a grocery bag. Shortly thereafter, the subject called R.C. and said that a courier would be there shortly to pick up the funds.

73. Around 12:30 PM, a silver Honda Accord bearing an Ohio tag parked in front of C.C.'s residence. FTPD officers approached the vehicle, which was operated by E.B., and read E.B. his Miranda rights. E.B. agreed to talk to officers and explained that he worked as a Lyft driver and was requested through the Lyft App to pick up a package. E.B. stated that he was to be

paid \$93.50 for the delivery and that the individual who ordered the ride sent E.B. a message that E.B. would receive a \$100 tip for successful delivery of the package. The delivery address provided by the individual who ordered the ride was 6100 Laurent Drive, Parma, Ohio. As discussed below, this is the package room for 5800 Laurent Drive, Apartment C520, Parma, Ohio 44129.

#### Analysis of Financial Records

74. In February 2025, in response to legal process, the FBI obtained records for several of BISONO-RODRIGUEZ's accounts with Key Bank. One of the accounts, a personal account ending in 0336, was opened in April 2024. BISONO-RODRIGUEZ provided 5800 Laurent Drive, Apartment C520, Parma, Ohio 44129 as both his home and mailing address. The transactions in BISONO-RODRIGUEZ's account reflect large deposits and transfers of cash consistent with the receipt of funds from the Subject Offenses.

75. For example, the records from Key Bank showed that between August 12, 2024 and December 2, 2024, BISONO-RODRIGUEZ made over \$50,000 of cash deposits into X0336.

76. In October 2024, BISONO-RODRIGUEZ opened a Key Bank business account ending in 6903 and titled to Mr. Detailing & Water Pressure Clean, LLC. As with account X0336, BISONO-RODRIGUEZ provided a registered address of 5800 Laurent Drive, Apartment C520.

77. In late 2024, BISONO-RODRIGUEZ started to make large cash deposits into business account X6903, as depicted below:

Date	Deposit Amount
December 30, 2024	\$2,120
December 30, 2024	\$1,280
December 13, 2024	\$3,000

78. As discussed above, BISONO-RODRIGUEZ picked up \$20,000 in stolen funds on December 10, 2024 and \$6,000 on December 12, 2024. The \$3,000 deposit into BISONO-RODRIGUEZ's business account on December 13, 2024 closely followed these pick-ups.

79. Between December 16, 2024 and December 31, 2024, BISONO-RODRIGUEZ transferred over \$5,500 from business account X6903 to personal account X0336, with no apparent business purpose.

80. Records maintained by the State of Ohio show that the business Mr Detailing & Water Pressure Clean, LLC, was incorporated by BISONO-RODRIGUEZ on October 17, 2024. The registration address for the business was 5800 Laurent Drive, Apartment C520.

81. Despite establishing a business bank account that received over \$6,000 in cash deposits in December 2024, BISONO-RODRIGUEZ's business does not appear to have a physical location other than 5800 Laurent Drive, Apartment C520.

82. Records obtained from Western Union reveal that BISONO-RODRIGUEZ has continued to send large wires to individuals in Santiago, Dominican Republic, as he did within 24 hours of picking-up funds from numerous victims discussed in this Affidavit. For example, BISONO RODRIGUEZ sent \$2,300 on February 22, 2025 and \$2,150 on February 26, 2025.

### CONCLUSION

83. In conclusion, there is probable cause to believe BISONO-RODRIGUEZ did knowingly, intentionally, and unlawfully conspire with persons both known and unknown, to defraud victims in the Western District of Pennsylvania out of tens of thousands of dollars pursuant to a grandparent scam.

84. Based upon my training, knowledge, experience, and the foregoing facts, I believe probable cause exists that, from in or around June 2024 and continuing through January 2025, in the Western District of Pennsylvania and elsewhere, BISONO-RODRIGUEZ violated Title 18,

United States Code, Sections (Transportation of Stolen Money), 2315 (Receipt of Stolen Money), and 2 (Aiding and Abetting).

85. The above information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

s/Travis Reece

Travis Reece, Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me, by telephone  
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),  
this 19th day of March 2025.



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HONORABLE MAUREEN P. KELLY  
UNITED STATES MAGISTRATE JUDGE